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*Attorney for Plaintiff*  
Shane Ioane

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII**

SHANE IOANE, on behalf of himself and all others similarly situated, ) CASE NO. 1:20-CV-00040 JAO-WRP  
Plaintiff, ) STIPULATION FOR DISMISSAL  
v. ) WITH PREJUDICE OF ENTIRE  
Defendant. ) ACTION

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**STIPULATION FOR DISMISSAL  
WITH PREJUDICE OF ENTIRE ACTION**

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Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, it is hereby STIPULATED AND AGREED, by and between Plaintiff Shane Ioane (“Plaintiff”) and Defendant MRS BPO, LLC a/k/a MRS ASSOCIATES OF NEW JERSEY (“Defendant”), by and through their undersigned counsel, that all of Plaintiff’s claims in the Action against Defendant, and any and all claims that

Plaintiff could have raised in the Action against Defendant, shall be and hereby are DISMISSED WITH PREJUDICE. Plaintiff and Defendant are to each bear their own respective attorneys' fees and costs.

There are no remaining claims or issues remaining in the Action as between Plaintiff and Defendant. All appearing parties in the Action have signed this Stipulation through their respective undersigned counsel.

Respectfully submitted this 27<sup>th</sup> day of January, 2021.

**/s/ Justin A. Brackett**

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APPROVED AS TO FORM:



A handwritten signature in black ink that reads "jill a. otake".

Jill A. Otake  
United States District Judge

Ioane v. MRS BPO, LLC – 1:20-CV-00040 JAO-WRP – Stipulation for Dismissal  
with Prejudice of Entire Action